

COMPLAINT

(for filers who are prisoners without lawyers)

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF WISCONSIN

(Full name of plaintiff(s))

Sean David Schultz

v.

Case Number:

(Full name of defendant(s))

(to be supplied by Clerk of Court)

Waupun Correctional Institution

Wisconsin DOC, ^{COTI} officer Stoffel

^{COTI} Officer McGuinness, ^{as} Sgt. Officer
Reynolds

A. PARTIES

1. Plaintiff is a citizen of Wisconsin, and is located at
(State)

Waupun Correctional Institution, Po Box 351, Waupun, WI, 53963
(Address of prison or jail)

(If more than one plaintiff is filing, use another piece of paper.)

2. Defendant Waupun Correctional Institution
(Name)

is (if a person or private corporation) a citizen of Wisconsin

Complaint page 1 continued

Defendants

(2) Parties -

Sgt. ? Stoffel

COII ? McGuinness

Sgt. ? Reynolds

Defendant

Sgt. Stoffel is a ~~person~~ citizen of Wisconsin.
and resides at unknown address and worked
for Wisconsin DOC, Waupun Correctional Institution.

Defendant

Sgt. Reynolds is a citizen of Wisconsin, and resides
at unknown address and worked for Wisconsin
DOC, Waupun Correctional

Defendant

COII Reynolds is a citizen of Wisconsin, and
resides at unknown address and worked for
Wisconsin DOC, Waupun Correctional

(State, if known)
and (if a person) resides at Unknown
(Address, if known)
and (if the defendant harmed you while doing the defendant's job)
worked for Wisconsin Doc, Waupun Correctional
(Employer's name and address, if known)

(If you need to list more defendants, use another piece of paper.)

B. STATEMENT OF CLAIM

On the space provided on the following pages, tell:

1. Who violated your rights;
2. What each defendant did;
3. When they did it;
4. Where it happened; and
5. Why they did it, if you know.

on 7-23-23 @ 8:30 am, I notified CO II, Sgt. Staffel, who was located in RHU (Segregation) Bubble. I was located in RHU B-122, I pressed my in-cell intercom button, and told her, "I'm suicidal, I have a razor..." I was immediately cut off by her before I could finish speaking. She said, "Okay, do it already." Laughed and hung up. I repeatedly pressed my emergency button, to get help, 5 other people pressed theirs too, to notify staff, "I was suicidal." She hung up on 2 people and ignored 1 and said "Okay" too 2 others. Their statements will be sent. At 8:46 am, 16 mins later, after being ignored, CO II McGuinness

came to my cell with a camera on. I told him what Sgt. Stoffel said. And I was suicidal, I have a razor, and I want to go on ^{observation} ~~observation~~ status. He left my cell at 8:47:33 am. I repeatedly banged on my door, saying "I was suicidal." I was ignored, multiple inmates tried to get staff to me. After an hour of being ignored by co's. At 9:30 I started cutting myself. I ~~was~~ repeatedly pressing my emergency button this whole time. At about 9:50, Sgt. Stoffel, answered me on the intercom, I told her, "I cut myself multiple times. I need a nurse, and he pulled out." She ignored me. No staff came until 10:29:57 am. CO II McGuinness came to my cell, camera on. I told him, "I have cuts, I'm bleeding, I need a nurse to clean my wounds." He said, "No problem". He was notified again at 11:49 am and 12:08 pm camera on being told. And being ignored. He told me his Sgt. "Sgt Reynolds was told everything." I was left in my cell bleeding from razor cuts until 6 pm that day. They ignored self harm claims, even after cutting. Never put me in suicide watch observation. Law states they

have to. They knew I had a weapon. It's a violation of deliberate indifference, and failure to protect. CO's in Waupun don't care about my safety or others. The Wisconsin Doc has known for decades, and WCI continues to allow it to happen. There are many Court cases to verify this.

Statement of Claim continued pg. 4

The same behavior continues, and if it has continued for decades, its being condoned. They violated my rights, and has caused me emotional distress, by nothing being done to these co's even after winning my Inmate Complaint to this institution. I notified Pusich the Security Director, Health Services unit, The Warden Randall Hepp. All Camera, intercom and paperwork is preserved and exhausted.

C. JURISDICTION

☒ I am suing for a violation of federal law under 28 U.S.C. § 1331.

OR

☐ I am suing under state law. The state citizenship of the plaintiff(s) is (are) different from the state citizenship of every defendant, and the amount of money at stake in this case (not counting interest and costs) is \$_____.

D. RELIEF WANTED

Describe what you want the Court to do if you win your lawsuit. Examples may include an award of money or an order telling defendants to do something or to stop doing something.

I want compensation in form of money. From Waupun Correctional Institution, and punitive damages to all three correctional officers involved, to assist in future behavior, that is similar, to end.

I want damages money for injury also.

I want compensatory damages in the amount of \$50,000 against each defendant, jointly and severally.

I also seek nominal damages and punitive damages in the amount of \$40,000.

I also seek a jury trial, and recovery of costs in this suit and any relief this court deems just and proper.

E. JURY DEMAND

I want a jury to hear my case.

☒ - YES

☐ - NO

I declare under penalty of perjury that the foregoing is true and correct.

Complaint signed this 15th day of November 2023.

Respectfully Submitted,


Signature of Plaintiff

516779
Plaintiff's Prisoner ID Number

Waupun Correctional Institution
PO Box 351 Waupun WI 53963
(Mailing Address of Plaintiff)

(If more than one plaintiff, use another piece of paper.)

REQUEST TO PROCEED IN DISTRICT COURT WITHOUT PREPAYING THE FULL FILING FEE

☒ I DO request that I be allowed to file this complaint without paying the filing fee. I have completed a Request to Proceed in District Court without Prepaying the Full Filing Fee form and have attached it to the complaint.

☐ I DO NOT request that I be allowed to file this complaint without prepaying the filing fee under 28 U.S.C. § 1915, and I have included the full filing fee with this complaint.